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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED] ORDER
 REGARDING LETTER BRIEFING ON
 PRODUCTION OF DOCUMENTS FROM
 OTHER SEXUAL ASSAULT CASES UNDER
 PTO NO. 5 AND EXTENSION OF TIME IN
 WHICH TO SUBMIT PROPOSED
 PRIVILEGE LOG ORDERS AND
 PROPOSED FACT SHEETS**

This Document Relates to:
 ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
 Courtroom: G – 15th Floor

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STIPULATION

WHEREAS, on December 28, 2023, the Court ordered Defendants to produce “all documents Defendants produced in any other Uber sexual assault cases, including arbitrations, and any other cases about the ‘Safe Rides Fee,’ including any associated privilege logs,” setting February 8, 2024, as the date by when Defendants shall endeavor to complete those productions. Pretrial Order No. 5, Dkt. No. 175 at 4.

WHEREAS, on January 19, 2024, Defendants raised at the Case Management Conference concerns regarding the production of case-specific documents from previously-resolved cases.

WHEREAS, on January 19, 2024, the parties agreed to submit a stipulated order setting a briefing schedule concerning Defendants’ motion to modify Pretrial Order No. 5.

WHEREAS, on December 28, 2023, the Court ordered that by “January 15, 2024, Co-Lead Counsel and Defendants shall submit joint or competing proposed orders, along with joint or competing facts sheets.” Pretrial Order No. 5, Dkt. No. 175 at 3.

WHEREAS, on January 11, 2024, the parties filed a joint stipulation stating that they would file by January 24, 2024, their “joint or competing proposed orders, along with joint or competing fact sheets.” Dkt. No. 198 at 3.

WHEREAS, on January 15, 2024, the parties stated in their Joint Case Management Conference Statement that they would file joint or competing Privileged Materials Order proposals by January 24, 2024. Dkt. No. 207 at 4-5.

WHEREAS, the parties are meeting and conferring regarding the fact sheets and the Privileged Materials Order and require a short extension of the deadline for both submissions in order to further narrow the disputes and thoroughly brief the remaining areas of disagreement.

WHEREAS, on January 23, 2024, Uber filed a motion for an extension of time in which to file the proposed plaintiff and defense fact sheets in part because of a family tragedy that Plaintiffs’ counsel was unaware of. Dkt. No. 219.

WHEREAS, Uber agreed to withdraw its motion for an extension of time in which to file the proposed plaintiff and defense fact sheets in light of this stipulation.

1 **THEREFORE**, the parties respectfully request the Court enter the parties' stipulation that:

2 (1) With regard to Uber's motion to modify Pretrial Order No 5, Uber shall file its
3 opening brief of no more than ten (10) pages on the scope of discovery required for productions of
4 other case documents, with an opening brief due by February 6, 2024. Plaintiffs shall file their
5 opposition brief of no more than ten (10) pages by February 20, 2024. Subject to the Court's
6 availability, a hearing date shall be set for February 22, 2024.

7 (2) With regard to the privileged materials submission, the parties will file joint or
8 competing Privileged Materials Order proposals by January 26, 2024. The parties will hold a final
9 meet and confer no later than noon PST on January 25, 2024.

10 (3) With regard to the proposed plaintiff and defense fact sheets, the parties will file
11 joint or competing plaintiff and defense fact sheets by January 31, 2024. The parties will exchange
12 their final proposals no later than close of business PST on January 26, 2024, and will hold a final
13 meet and confer no later than close of business PST on January 29, 2024.

14
15 **IT IS SO STIPULATED.**

16
17 Dated: January 24, 2024

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

By: /s/ Randall S. Luskey

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Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

1 Dated: January 24, 2024

Respectfully submitted,

2 By: /s/ Sarah R. London

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FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: January 24, 2024

By: /s/ Randall S. Luskey
Randall S. Luskey

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

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Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

The Court hereby GRANTS the parties' stipulation as follows:

1. With regard to Uber's motion to modify Pretrial Order No 5, Uber shall file its opening brief of no more than ten (10) pages on the scope of discovery required for productions of other case documents, with an opening brief due by February 6, 2024. Plaintiffs shall file their opposition brief of no more than ten (10) pages by February 20, 2024. A hearing date shall be set for February 22, 2024.

2. With regard to the privileged materials submission, the parties will file joint or competing Privileged Materials Order proposals by January 26, 2024. The parties will hold a final meet and confer by noon PST on January 25, 2024.

1 3. With regard to the proposed plaintiff and defense fact sheets, the parties will file
2 joint or competing plaintiff and defense fact sheets by January 31, 2024. If the parties submit
3 competing proposals, each shall submit a memorandum (not to exceed ten pages) in support of each
4 party's proposed plaintiff fact sheet and a memorandum (not to exceed ten pages) in support of
5 each party's proposed defense fact sheet. The parties will exchange their final proposals no later
6 than close of business PST on January 26, 2024, and will hold a final meet and confer no later than
7 close of business PST on January 29, 2024.

8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9
10 Date: _____, 2024

11 HON. LISA J. CISNEROS
12 UNITED STATES MAGISTRATE JUDGE